

## WHISTLEBLOWER POLICY

1. Introduction. Palmetto Paralegal Association (PPA) requires its officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of PPA, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. PPA officers must also comply with the PPA Board Member Code of Conduct.
2. Reporting Responsibility. It is the responsibility of the officers to report misconduct, policy violations or suspected policy violations in accordance with this Whistleblower Policy.
3. Retaliation. No officer or member who in good faith reports a violation shall suffer harassment, retaliation or adverse membership consequence. An officer or member who retaliates against someone who has reported a policy violation, or suspected policy violation in good faith is subject to discipline up to and including termination of membership or service. This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns within the PPA prior to seeking resolution outside the PPA.
4. Reporting Violations. PPA has an open door policy and requests that members share their questions, concerns, suggestions or complaints with who can address them properly. In most cases, the Association's President is in the best position to address an area of concern. However, if a member is not comfortable speaking with the PPA President or the member is not satisfied with the PPA President's response, such individual is encouraged to speak with someone else on the PPA Board with whom the individual is comfortable. Board members are required to report suspected policy violations to the PPA Compliance Officer, who has specific and exclusive responsibility to investigate all reported policy violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following PPA's open door policy, individuals should contact the President directly.
5. Compliance Officer. PPA's Compliance Officer is the President of PPA. He/she is responsible for investigating and resolving all reported complaints and allegations concerning policy violations and may involve other members of the Executive Board in the investigation. Further, he/she may, at his/her discretion, advise the Executive Board of complaints made and investigations undertaken. The Compliance Officer is required to report to the audit committee at least annually on compliance activity.
6. Accounting and Auditing Matters. The Executive Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.
7. Acting in Good Faith. A member filing a complaint concerning a policy violation or suspected policy violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Making allegations that prove not to

be substantiated or that prove to have been made maliciously or when known to be false will be viewed as a serious disciplinary offense.

8. Confidentiality. Policy violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of policy violations or suspected policy violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

9. Handling of Reported Violations. The Compliance Officer will notify the complainant and acknowledge receipt of the reported violation or suspected policy violation within ten (10) business days. All reports will be promptly investigated and appropriate corrective action, as determined by the Compliance Officer in his or her sole discretion, will be taken if warranted by the investigation.